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[Additional counsel of record listed on signature page]

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,
LINDSAY ELIZABETH, and HEATHER
HENDER, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No.: 3:18-cv-01477-AB

**JOINT STATUS REPORT
REGARDING NIKE'S MOTION FOR
ATTORNEYS' FEES [ECF No. 567]**

NIKE, Inc. (“NIKE”) and Markowitz Herbold PC (“Markowitz,” and together with NIKE, the “Parties”) through their respective counsel submit this status report regarding NIKE’s motion for attorneys’ fees (the “Attorneys’ Fees Motion”) pursuant to the Court’s order at ECF No. 626.

On February 21, 2025, the Court ordered the Parties to inform the Court by March 7, 2025, whether “they wish to lift the stay” on NIKE’s Attorneys’ Fees Motion (ECF No. 567). On March 7, 2025, the Parties notified the Court that the Parties had accepted a mediator’s proposal to resolve NIKE’s motion and were in the process of memorializing the agreed settlement terms. (*See* ECF No. 626.) The Parties also requested leave to update the Court regarding their progress on April 11, 2025. (*See id.*) Thereafter, the Court entered an order directing the parties to file a status report to inform the Court whether they have resolved the Attorneys’ Fees Motion on April 11, 2025. (*Id.*)

Following the Court’s order, the Parties have been working in good faith to memorialize a long-form agreement, and that process is ongoing. The Parties believe that more time is needed to complete their discussions and hereby request an additional 21-days (until May 2, 2025) to update the Court regarding a resolution of the Attorneys’ Fees Motion. The Parties also request that the Court continue the stay on the Attorneys’ Fees Motion, as set by ECF No. 574.

Dated: April 11, 2025

s/ Daniel Prince

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Dated: April 11, 2025

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Attorneys for Non-Party Markowitz Herbold PC

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: April 11, 2025

Respectfully submitted,

PAUL HASTINGS LLP

s/ Daniel Prince
Daniel Prince (*pro hac vice*)

[PROPOSED] ORDER

The parties are ordered to provide a joint status report regarding NIKE's motion for attorneys' fees (ECF No. 567) and whether the parties wish to lift the stay on such motion, as set by ECF No. 574, by May 2, 2025.

IT IS SO ORDERED.

Dated:

HON. AMY BAGGIO
United States District Judge